

EXCERPTS FROM THE DEPOSITION OF
MICHAEL HARTZMARK
TAKEN MARCH 18, 2022

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA

3 IN RE:)
4 TESLA, INC., SECURITIES) Case No.
LITIGATION) 18-cv-04865-EMC
5)
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8 *****
9 REMOTE VIDEOTAPED DEPOSITION OF
MICHAEL HARTZMARK
March 18, 2022
10 *****
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13 MICHAEL HARTZMARK, produced as a witness at
14 the instance of the Plaintiffs, was duly sworn and
15 deposed in the above-styled and numbered cause on
16 March 18, 2022, from 8:39 a.m. to 6:28 p.m. CST,
17 stenographically reported, pursuant to the Federal
18 Rules of Civil Procedure and the provisions stated
19 on the record.
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21

22 Reported by: Rebecca A. Graziano, CSR, RMR, CRR
23 Texas CSR 9306
24 California CSR 14407
Illinois CSR 084.004659
25

A P P E A R A N C E S

(all attendees appearing via remote videoconference)

REPRESENTING THE PLAINTIFFS:

Mr. Nicholas I. Porritt
Mr. Alexander Krot, III
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REPRESENTING THE DEFENDANTS:

Mr. Andrew J. Rossman
Mr. Jesse Bernstein
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andrewrossman@quinnemanuel.com
jessebernstein@quinnemanuel.com

ALSO PRESENT:

Mr. Michael A. Keable, Executive Vice President,
Compass Lexecon

THE VIDEOGRAPHER:

Mr. Paul D'Ambra

1 PROCEEDINGS

2 (On the record at 8:39 a.m. CST)

3 THE VIDEOGRAPHER: We are now on
4 the record. Today's date is March 18th,
5 2022. The time is 9:39 a.m. Eastern.6 This is the recorded video
7 deposition of Michael Hartzmark in the
8 matter of in re Tesla, Incorporated,
9 securities litigation in the United States
10 District Court, Northern District of
11 California, Case Number 18-cv-04865-EMC.12 My name is Paul D'Ambra from
13 Everest Court Reporting. I'm the video
14 specialist. Our court reporter today is
15 Becky Graziano, also with Everest. All
16 counsel appearing today will be noted on
17 the stenographic record.18 Will the court reporter please
19 swear in the witness.

20 (Witness duly sworn.)

21 MICHAEL HARTZMARK,
22 being first duly sworn, testified as follows:

23 EXAMINATION

24 BY MR. ROSSMAN:

25 Q Very good. Good morning again,

DEPOSITION TESTIMONY
FILED UNDER SEAL

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF CALIFORNIA

3 IN RE:)
4 TESLA, INC., SECURITIES) Case No.
LITIGATION) 18-cv-04865-EMC
5)

6 REPORTER'S CERTIFICATION
7 REMOTE VIDEOTAPED DEPOSITION OF
MICHAEL HARTZMARK
8 March 18, 2022

9 I, Rebecca A. Graziano, Certified Shorthand
10 Reporter in and for the States of Texas,
11 California, and Illinois, hereby certify to the
12 following:

13 That the witness, MICHAEL HARTZMARK, was
14 duly sworn and that the transcript of the oral
15 deposition is a true record of the testimony given
16 by the witness;

17 I further certify that pursuant to FRCP Rule
18 30(f)(1) that the signature of the deponent:

19 _____ was requested by the deponent or a
20 party before the completion of the deposition and
21 returned within 30 days from date of receipt of
22 the transcript. If returned, the attached Changes
23 and Signature Page contains any changes and the
24 reasons therefor.

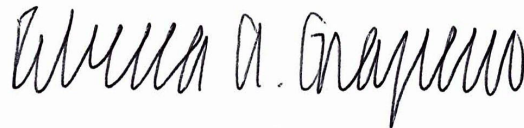
25 _____ was not requested by the deponent or a

1 party before the completion of the deposition.

2 I further certify that I am neither attorney
3 nor counsel for, related to, nor employed by any
4 of the parties to the action in which this
5 testimony was taken.

6 Further, I am not a relative or employee of
7 any attorney of record in this cause, nor do I
8 have a financial interest in the action.

9
10 Certified on March 20, 2022

11 
12

13 _____
14 Rebecca A. Graziano, CSR, RMR, CRR
15 Texas CSR 9306
16 Expiration: 07/31/22
17 California CSR 14407
18 Expiration: 09/30/22
19 Illinois CSR 084.004659
20 Expiration: 05/31/23
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